

# **EXHIBIT R**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF LAUREN MANNING**

I, Lauren Manning, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. I was in New York City at Ground Zero when the plane(s) hit the towers and I received physical injuries in the subsequent explosion and fires. In the course of the attack and my escape, I witnessed extraordinary atrocities in what was essentially a war zone. The brutality of the attacks radically altered my life forever.

4. On September 11, 2001, I was in the lobby of the north tower, 1 World Trade Center (1WTC) when the first attack occurred, and a jet was flown into the 1WTC.

5. At the time of the 9-11 attacks, I worked as a partner and managing director at Cantor Fitzgerald on the 105<sup>th</sup> floor of 1WTC. On the morning of 9/11/2001 when terrorists

plunged a passenger jet loaded with fuel into 1WTC, I was in the lobby arriving at the elevator banks to begin making my way to my office. As I turned toward the elevator bank, a wall of fire exploded out of the elevators: a direct result of the impact of the passenger jet into the upper floors of the building only seconds before. The fire engulfed everything in its path. In an instant, I was covered in flames. The burn continued to intensify as the flames wrapped around me and ate away at my body. I fought to escape, battling my way out of the building. I was only able to reach the sidewalk outside of WTC1 after the backdraft of fire following the explosion finally released. My body was covered in flames as I ran across the West Side Highway to a small patch of grass in front of the World Financial Center. When I reached the grassy area, I dropped and rolled, smothering the flames. Two men then came to aid of the few who had escaped, soon the others on the bank lay unmoving; dead. I witnessed the second plane hit WTC2 and watched people hurl themselves out of the flaming buildings, falling to their deaths amidst the chaos of fire, smoke, breaking glass, and endless screams. The pain continued to drill deeper and deeper, and I felt that only death would bring me any release from the pain. At one point I prayed to die, but I determined to continue to fight struggling to maintain consciousness while battling the profound, and relentless burn penetration.

6. Amidst the mayhem, and less than 10 minutes before WTC2 fell, I lay on the floor of an EMS ambulance headed to St. Vincent's Hospital. The St. Vincent's medical team, which did not have the benefit of a dedicated burn unit, struggled to treat me due to the catastrophic nature of my wounds. I lay in pure agony hearing the treating nurses calling to Weill Cornell's Burn Center for guidance and realized they did not know what they were doing with respect to immediate treatment of severe burn trauma. I remained fully conscious, screaming for them to get me to the burn center. Because of the lack of appropriate pain management, the torment of pain

wasn't modified until volunteer medical staff (2 burn nurses from Minnesota on holiday in NYC, who had volunteered off the street) intubated me at approximately 3pm so that I could be sedated, more than 6 hours after the flames had first engulfed me.

7. It was 7 pm on the evening of 9-11, when a transport exemption from the emergency lockdown of the city, and EMS then transported me to New York Presbyterian Hospital's Weill Cornell Medical Burn Center. The doctors quickly concluded that I had suffered burns over 82.5% of my body, the majority third degree, odds of my living were calculated at most 17.5%. This number dwindled to single digits for months at a time due to the massive nature of the trauma, wounds and related infections. I spent three months at the Weill Cornell Burn Center, the first seven and a half weeks in a continuation of the medically induced coma. Once out of the coma, no amount of pain killers, was sufficiently able to manage the ongoing extreme and interminable pain. While in the burn unit, I underwent more than twenty-five operations, which included over sixty individual surgical procedures. These procedures included a massive number of skin grafts. The most painful treatment memories were struggling to breathe, having no ability to speak, having no control over my bodily functions, and the near daily visits to the "tank." I would be given additional intravenous pain killers in advance of going to the tank room, where I was laid onto a metal slab and wounds were abraded with water hoses and stiff brushes to control hypertrophic scar buildup. During my care and treatment, I suffered from prolonged, potentially deadly infections, and an ongoing series complications including collapsed lungs and other respiratory issues. I would suffer from open wounds that oozed blood, and a highly elevated heartbeat for years after the events of 9-11. I continue to suffer from frequent respiratory issues, I developed a stomach ulcer. My body remains riddled with deformities, internal staples, and unstable skin that due to the severity of the wounds rips and tears easily resulting in frequent infections.



8. Following the months of crisis intervention at Weill Cornell that both helped save and stabilize me, I was sent on to Burke Rehabilitation Hospital. At Burke, I would spend an additional three re-learning how to stand, and how to walk, and how to adaptively use my severely altered hands and body as a result of amputations and the crippling effects of the burn. My mobility was extremely limited, I was unable to turn in bed, shower or toilet myself, unable to eat on my own and unable to cloth myself. I had an exhausting schedule of six hours of physical therapy and occupational therapy per day, six days a week. A daily routine of physical and occupational therapy continues to this day, along with 24-hour home health care aide assistance. Due to the severity of my burn injuries, my doctors did not realize that I had also broken bones in my right ankle and foot while running across West Street to escape the burning tower. Only in re-breaking the poorly healed bones, was the original lapse in diagnosis noticed. I continue to have periodic mobility issues with my left knee and ankle.

9. During the terrorist attacks, I suffered the following specific injuries on September 11, 2001: severe total body burn of 82.5%; the loss of multiple layers of flesh, that has left my body with profuse deformations and deep scarring; lung and nasal damage, partial amputation of four fingers, and the loss of the DIP joints of two other fingers; the loss of my left ear; various spinal cord compressions L3-L7 and throughout the lower spine sacral area; further deformities and compromises to a significant number of joints, including fingers, elbows, wrists and shoulders. Most of the joints on my hands are fused and pinned with titanium or have naturally, partially fused from joint damage, including my left elbow and wrist.

10. Over the course of seven years following 9/11, I continued to have surgeries and procedures to increase joint mobility, release scar contractures, and in attempts to help close several wound locations which remained open for multiple years. I remain at high risk for further

amputations as I age and blood flow to already compromised extremities further decreases. I endure chronic pain, anxiety and claustrophobia.

11. Another source of deep emotional pain for me has been in witness to my son's suffering. He was 10.5 months old at the time of the attacks. I did not return home for more than half a year. My son learned to walk in the corridors of a hospital, some of his earliest friends my nurses and aides. He endured seeing blood-soaked bandages, tortuous splints, and open wounds. He saw a mom who although alive and grateful, would never be the same. For years, I remained covered head to toe in highly restrictive compression garments and plastic silicone face masks; the embodiment of a strange and disturbing figure. We sought preventative intervention for our son at a young age, but the programs available to 9/11 children were geared solely to those whose parents had been killed. Although he had appeared to be fine when my son turned 11, a severe latent post-traumatic stress syndrome ensued. He withdrew from family and friends, his academic performance plunged, and his behavior notably changed to extreme anger and sadness.

12. I had prayed and battled to live for my son, and ironically, it was now he who was acute with suffering. I tried mightily but was unable to heal the breadth of his emotional wounds. He presented with a severe disorganized attachment disorder, an eating disorder (at one point 12% beneath the 0 percentile for his size) chronic, acute anxiety and a chronic, acute depression that included suicide ideation. For him, the bad guys and monsters seen only as characters in a child's movie were indeed real. At a very young age, he had come to understand the world as a highly dangerous and scary place.

13. He would spend 3 months in New Vision wilderness therapy program, followed by 18 months at Forest Heights, a residential treatment center. He would repeat his freshman year of high school. He continues under the care of a psychiatrist and social worker and takes medication

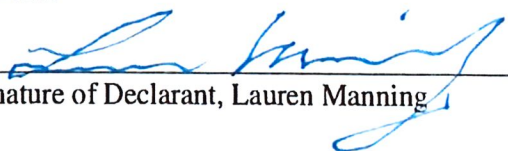
to manage the anxiety/depression. He is scheduled to graduate high school this May. He has worked very hard to heal, and he is starting to share his experiences in an effort to help others with undiagnosed PTSD, through research and a help site for teen PTSD called Sharing Our Stories: SOSteenptsd.org. My son's memories and ongoing periodic episodes of extreme anxiety and depression are an indelible part of his life and family history, a direct result of the trauma and pain that he encountered as the son of a catastrophically wounded 9/11 survivor.

14. I sought medical attention for my injuries as detailed above. Attached as Exhibits B and C to this Declaration are true and correct copies of my prior applications to the September 11th Victim Compensation Fund (VCF I). In each of these prior applications, I detailed my experiences and my severe injuries from 9-11, as well as the years of medical treatment that I received thereafter.

15. As referenced above, I previously pursued claims specifically related to my physical injuries incurred on September 11, 2001 in the VCF I of the September 11<sup>th</sup> Victim Compensation Fund, and my claims were determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 31 day of January 2020.

  
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Signature of Declarant, Lauren Manning

# **Exhibits Filed Under Seal**